

Privacy notice for data subjects (25 October 2023)

Name of the register	Feedback questionnaire for university of applied sciences graduands – AVOP
Date	25 October 2023
Controllers, contact persons and persons responsible for the register	Finland’s universities of applied sciences act as controllers and each university of applied sciences acts as an independent controller. Controllers, contact persons and the persons responsible for the register can be found at https://wiki.eduuni.fi/display/CscArvo/Tietosuojailmoitusta+tarkentavat+ko+rkeakoulukohtaiset+tiedot (The website is in Finnish).
Data protection officer and contact information	The details of each university of applied sciences can found at https://wiki.eduuni.fi/display/CscArvo/Tietosuojailmoitusta+tarkentavat+ko+rkeakoulukohtaiset+tiedot (The website is in Finnish).
Purpose for maintaining the register and legal basis for processing personal data	<p>AVOP is a feedback questionnaire for university of applied sciences graduands (data collection) in which students can evaluate and give feedback on their education. The results are used by the universities of applied sciences to develop their own activities and, at national level, in the steering and funding of education. All degree students graduating from the universities of applied sciences are requested to complete the questionnaire.</p> <p>The Rectors’ Conference of Finnish Universities of Applied Sciences (Arene) is responsible for the questions asked in the survey. Matters concerning the funding model are the responsibility of the Ministry of Education and Culture.</p> <p>The answers are collected using the Arvo Education Management Information Service, which is maintained and developed by CSC – IT Center for Science Ltd.</p> <p>Students’ HAKA logins are used to retrieve information on their right to study from the VIRT A Higher Education Achievement Register. The information kept in VIRT A is needed to confirm the students’ right to complete the AVOP, refer them to the correct survey and link the details of the respondents who have given their consent with the data kept in the student register.</p> <p>The universities of applied sciences process the information provided by the respondents to carry out their basic task and to develop teaching and education and for quality assurance and statistical purposes. All data supplied by the respondents is reported in a manner ensuring that individual persons cannot be identified.</p> <p>The right of the universities of applied sciences to process personal data as controllers is based on</p>

	<ul style="list-style-type: none"> • compliance with a legal obligation (Article 6.1 c of the General Data Protection Regulation) <ul style="list-style-type: none"> ○ the Universities of Applied Sciences Act (932/2014) and the decrees issued under it ○ the Government Decree on Universities of Applied Sciences (1129/2014) as amended ○ chapter 5 of the Act on the National Registers of Education Records, Qualifications and Degrees (884/2017) Universities of applied sciences must evaluate the education that they provide, their other activities and their impact. • on consent (Article 6.1 a of the General Data Protection Regulation) <ul style="list-style-type: none"> ○ The consent given by the respondents to using the answers for research purposes and to supplementing the answers with the study register data.
A: Personal data is collected directly from you	Yes, in an electronic survey.
B: Personal data is collected from other sources than you	Yes: <ul style="list-style-type: none"> • From your HAKA login • From the VIRT A Higher Education Achievement Register (data kept in the student register of the university of applied sciences) • From the student register of the university of applied sciences (not in all universities of applied sciences; read more at: https://wiki.eduuni.fi/display/CscArvo/Tietosuojailmoitusta+tarkentavat+korkeakoulukohtaiset+tiedot; the website is in Finnish)
Register data content (description of data subject groups and personal data groups)	<p>Data collected in the feedback survey:</p> Age Gender Previous education Answers given in the national feedback survey Answers given to questions specific to individual universities of applied sciences <p>Data collected from the VIRT A Higher Education Achievement Register:</p> Education provider Educational institution Place of business Degree Municipality The language that the degree was completed in Study right key (data is stored separately from other feedback data) Degree start date (data is stored separately from other feedback data) Nationality Language of education Place of study Type of education (day/blended learning) Training module identifier (free-form information provided by the university of applied sciences on a subject, degree programme or similar topic) Name of the study entitlement period Source of funding

	<p>Data collected from HAKA login: Organisation</p> <p>In HAKA login, your personal identity code and learner number are collected so that background information can be retrieved from the VIRT A Higher Education Achievement Register. <u>Your personal identity code and learner number are not entered in the register.</u></p> <p>Data collected from the student register of the university of applied sciences: Data collection methods vary between the universities of applied sciences. However, all data supplied by the respondents is reported in a manner ensuring that individual persons cannot be identified. Read more: https://wiki.eduuni.fi/display/CscArvo/Tietosuojailmoitusta+tarkentavat+ko rkeakoulukohtaiset+tiedot (The website is in Finnish)</p> <p>Log data on the respondent is also stored to ensure the functioning of CSC’s service, to identify harmful inquiries and to investigate errors. A timestamp on such matters as the opening of the form, the session ID and technical details of the terminal device and browser used (such as the browser user agent) are entered in the log.</p> <p>The register does not contain personal data on specific categories of persons.</p>
<p>Recipients and recipient groups of the personal data (= disclosures)</p>	<p>When processing and analysing data and preparing reports, universities of applied sciences may use the following parties as processors:</p> <ul style="list-style-type: none"> • CSC – IT Center for Science Ltd. Personal data is disclosed to CSC as the processor of the Arvo system for the following processing measures: study right key management, collection and storage of personal data in the IT service environment, investigation of problem situations, reporting of statistical data in the national Vipunen statistics service, processing of research data for jointly agreed research projects or official disclosures in accordance with controllers’ instructions, and processing and supply of data to the Finnish Social Science Data Archive. • Researchers or research institutes selected by the university of applied sciences that, commissioned by the university of applied sciences, edit the data into analyses and reports. • The Finnish Social Science Data Archive for archiving responses contained in the results of the universities of applied sciences that have concluded an archiving agreement with the Finnish Social Science Data Archive. From the Finnish Social Science Data Archive, information can be disclosed for such purposes as research or teaching after all details identifying individual persons has been erased from the datasets. <p>Data can be disclosed to researchers, research organisations or the public authorities that, based on a procedure specific to individual universities</p>

	<p>of applied sciences, receive permission to process the data of the university of applied sciences in question.</p> <p>No information is disclosed to other third parties.</p> <p>Each university of applied sciences only processes information on its own graduands.</p>
Transfer of data to third countries	No personal data is disclosed or otherwise transferred outside the EU or the EEA.
Data storage period/definition criteria	Personal data is stored in the ARVO system for five years. When retaining data, universities of applied sciences observe their own storage periods. Log data is stored for five years.
The right of data subjects to access, rectify or erase their data and their right to request for the restriction of the processing of their data or transfer their data from one system to another (Articles 15, 16, 17, 18 and 20 of the General Data Protection Regulation).	<p>Requests concerning the data subject's rights must be submitted to the controller. The details of the controllers in individual universities of applied sciences can be found at https://wiki.eduuni.fi/display/CscArvo/Tietosuojailmoitusta+tarkentavat+ko+rkeakoulukohtaiset+tiedot (The website is in Finnish).</p> <p>Student's access to their own data A student has the right to know which personal data on them is being processed, which data has been stored on them and to receive a copy of the personal data being processed.</p> <p>A student's right to rectification of their data A student has the right to demand that any erroneous, inaccurate or deficient personal data on them be rectified or supplemented without undue delay. The student also has the right to demand the erasure of any unnecessary personal data on them.</p> <p>A student's right to erasure of their data Based on the legal basis for the processing of the data, a student may have the right to demand the erasure of their personal data from the register. This right does not apply to cases where the processing of personal data is necessary to comply with a legal obligation. The storage and erasure of data is conducted in accordance with the data management plan of the university of applied sciences and statutory data storage periods.</p> <p>The right to request for the restriction of processing In certain situations, a student may have the right to ask for a restriction of the processing of their personal data until the legal basis for the data or its processing has been appropriately checked and corrected or supplemented.</p> <p>The right to transfer personal data from one system to the next to another controller The transfer of personal data from one system to the next means that the data subject receives the personal data that they have provided in a structured, commonly used and machine-readable format and that they can transfer the data in question to another controller without being prevented from doing so by the university of applied sciences. This right only applies to</p>

	<p>situations where the processing of the data is automatic and based on consent or an agreement.</p> <p>The right does not apply, for example, to the processing of such personal data that is necessary for the completion of a task related to the public interest or the fulfilment of a legal obligation belonging to the controller. This means that this right is not primarily applicable to the personal data registers of the universities of applied sciences.</p>
A data subject's right to object to data processing	<p>Based on a personal and special situation, a student has the right to object to the processing of their personal data at any time when the legal basis for the processing is the completion of a task concerning the public interest, the execution of public authority or the legitimate interest of the university of applied sciences. In such cases, the data may only be processed further if an especially and justified reason can be presented for the processing of the data.</p>
A data subject's right to withdraw their consent	<p>In situations where the processing of a student's personal data is based solely on consent, the student may withdraw their consent. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.</p> <p>The withdrawal of a data subject's consent must be submitted to the addresses of the individual universities of applied sciences, which can be found at https://wiki.eduuni.fi/display/CscArvo/Tietosuojailmoitusta+tarkentavat+ko rkeakoulukohtaiset+tiedot (The website is in Finnish).</p>
A data subject's right to submit a complaint to the supervisory authority	<p>A student may submit a complaint to the supervisory authority if they feel that the processing of their personal data violates the General Data Protection Regulation (EU) 2016/679. The student also has the right to exercise other administrative appeal methods and legal remedies. For more information, go to https://tietosuoja.fi/en</p> <p>The student also has the right to bring an action against the controller or organisation processing the personal data if they feel that their rights have been violated due to the fact that the student's personal data has not been processed in accordance with the General Data Protection Regulation.</p>
The processing of personal data for automated decision-making, including profiling	<p>The processing of the personal data does not involve automated decision-making or profiling.</p>

This policy contains the information mandated by the General Data Protection Regulation (Articles 13 and 14).